Law Offices

BLOOSTON, MORDKOFSKY, DICKENS, DUFFY & PRENDERGAST, LLP

2120 L STREET, NW WASHINGTON, DC 20037

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES BUENOS AIRES, ARGENTINA

> ROBERT M. JACKSON OF COUNSEL

PERRY W. WOOFTER LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ ENGINEERING CONSULTANT

(202) 659-0830 BENJAMIN H. DICKENS, JR. FACSIMILE: (202) 828-5568 JOHN A. PRENDERGAST

July 1, 2014

ARTHUR BLOOSTON 1914 - 1999

HAROLD MORDKOFSKY

GERARD J. DUFFY

RICHARD D. RUBINO MARY J. SISAK

D. CARY MITCHELL

SALVATORE TAILLEFER

WRITER'S CONTACT INFORMATION sta@bloostonlaw.com 202-828-5562

REDACTED - FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, DC 20554

Form 481 – Carrier Annual Reporting Data Collection, 2014 RE: WC Dockets No. 14-58, 10-90 and 11-42

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules, ¹ Electra Telephone Company (the "Company") hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,² the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its Five

¹ 47 CFR §§54.313 and 54.422.

² In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of the Company's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Salvatore Taillefer, Jr.

Counsel to Electra Telephone Company

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

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VIA HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

RE:

Form 481 – Carrier Annual Reporting Data Collection, 2014

WC Dockets No. 14-58, 10-90, and 11-42

Dear Ms. Dortch:

Pursuant to \$0.457 and \$0.459 of the Commission's rules, Electra Telephone Company ("the Company"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, the Company requests confidential treatment of the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, the Company states the following:

1. Identification of the specific information for which confidential treatment is sought.

The Company seeks confidential treatment of the Five Year Service Quality Improvement Plan, attachment 442069TX112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about the Company as well as information about the Company's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors," and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.²

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Plan relates to voice and broadband services provided by the Company that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the confidential information is likely to result in substantial competitive harm to the Company because the confidential information could provide competitors with commercially sensitive insights related to the Company's operations, service offerings, and costs.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

The Company does not make the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The Company does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

¹ *Id.* § 0.457(d)(2). ² 5 U.S.C. § 552(b)(4): 47 C.F,R. § 0.457(d).

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

The confidential information should be treated as confidential for an indefinite period, as the Company will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, the Company requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

Salvatore Taillefer, Jr.

Counsel for

Electra Telephone Company

	REDACTED		CINSPECTIO	M 481	
FCC For	m 481 - Carrier Annual Reporting		ОМВ	Control No. 3060-0986/	OMB Control No. 3060-0819
	Data Collection Form		July 2	013	
<010>	Study Area Code	442069		and the second s	
<015>	Study Area Name	ELECTRA TELEPHONE C	0		
		2015			
	Program Year	2013			***************************************
<030>	Contact Name: Person USAC should contact with questions about this data	Deborah Nobles			
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9046880029 ext.			
<039>	Contact Email Address: Email of the person identified in data line <030>	dnobles@townes.net	Odo artises	********	
					54.313 54.422
				Contract Con	ompletion Completion
ANNUA	L REPORTING FOR ALL CARRIERS				Required Required
***					(check box when complete)
	Service Quality Improvement Reporting		(complete attached worksheet		
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		outages to report			v (3)
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<320>	Unfulfilled Service Requests (broadband) 0			<u></u>	
<330>	Detail on Attempts (broadband)			<u> </u>	
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			(attached descriptive documen	ii) <u>L</u>	
<610>					
<700>	Company Price Offerings (voice)		 (complete attached workshee	t)	V
<710>	Company Price Offerings (broadband)		(complete attached workshee	T	
<800>	Operating Companies and Affiliates		(complete attached workshee	9	v v
	Tribal Land Offerings (Y/N)?	(if y	es, complete attached workshoe		
<1000>	Voice Services Rate Comparability		(check to Indicate certification	n)	V
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<1110>			(complete attached workshee	(1)	
<1200>	Terms and Condition for Lifeline Customers		(complete attached workshee	t)	
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2000	Including Rate-of-Return Carriers affiliated with Pric	ce Cap Local Exchange			
<2000> <2005>			(check to Indicate certification (complete attached worksheet		
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<3000>					
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		jujų 2013
<010>	Study Area Code	442069
<015>:	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) O O
<112>	54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only	¢42069tx112.pdf company is a
	required to address voice telephony service.	
	Please check these boxes below to confirm that the attached documents(s), on li	Name of Attached Document ine
<113>	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire	
	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	
<114>	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate. Maps detailing progress towards meeting plan targets	
<114> <115>	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate. Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received	
<113> <114> <115> <116> <117>	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate. Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service quality	

<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

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<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
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<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

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State	Exchange (ILEC)	Residential Rate	State Regulated	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)

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600) Operating Companies				FCC Form 481
ata Collection Form				OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code		442069		
<015> Study Area Name		ELECTRA TELEPHON	E CO	
<020> Program Year	(e. 8) (e. 8) (e. 8) (e. 8) (e. 8) (e. 8)	2015	105055 1 500	
<030> Contact Name - Person USAC should	contact regarding this data	Deborah Nobles	***************************************	
35> Contact Telephone Number - Number of person identified in data line <030>		9046880029 ext.	Andrew Control of the	-
<039> Contact Email Address - Email Addre	dnobles@townes.	net		
<810> Reporting Carrier Electra	Telephone Company			
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<812> Operating Company N/A			<u> </u>	
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<010>	Study Area Code	442069	
<015> <020>	Study Area Name Program Year	ELECTRA TELEPHONE CO 2015	
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles	
<035>	Contact Telephone Number - Number of person identified in data line <0		
<039>	Contact Email Address - Email Address of person identified in data line <		
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation	Name of Attached Document	
to confir demons § 54.313	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes rm the status described on the attached document(s), on line 920, trates coordination with the Tribal government pursuant to 8(a)(9) includes:	Select (Yes,No, NA)	
<921> <922>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions. Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner,		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Critical Press, various requirements.		
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tudy Area Name	
· · · · · · · · · · · · · · · · · · ·	ELECTRA TELEPHONE CO
rogram Year	2015
	Deborah Nobles
	9046030029 ext.
Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
lease check this box to confirm no terrestrial backhaul ptions exist within the supported area pursuant to § 54.313(G)	
Please check this box to confirm the reporting carrier offers proadband service of at least 1 Mbps downstream and 256 kbps pstream within the supported area pursuant to § 54.313(G)	
100000000000000000000000000000000000000	ontact Name - Person USAC should contact regarding this data ontact Telephone Number - Number of person identified in data line <030> ontact Email Address - Email Address of person identified in data line <030> ease check this box to confirm no terrestrial backhaul otions exist within the supported area pursuant to § 54.313(G) ease check this box to confirm the reporting carrier offers proadband service of at least 1 Mbps downstream and 256 kbps

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Data Coll	te Of Return Carrier Additional Documentation ection Form	FCC Form 481 OMB Control No. 3060-0986/OM8 Control No. 3060-0819 July 2013
<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data- Contact Telephone Number - Number of person Identified in data line <030>	Deborah Nobles 9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
	he boxes below to note compliance on its five year service quality plan (pursuant	between the control of the control o
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	. Name of Attached Document Listing Required Information
	Please check this box to confirm that the attached document(s), on line 3t § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresproviding access to broadband service in the preceding calendar year.	012 contains the required information pursuant to
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	
(3013) (3014)	Is your company a Privately Held. ROR Carrier [47 CFR § 54.313(f)(2)] If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)
Please	check these boxes to confirm that the attached document(s), on line 3017	, contains the required information pursuant to § 54.313(f)(2) compliance requires:
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016)	Document(s) for Balance Sheet, income Statement and Statement of Cas	th Flows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No). ()
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54,313(f)(2), contains	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a fo	rmat comparable to RUS Operating Report for Telecommunications
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	ash Flows
(3021)	Management letter issued by the independent certified public accountant that	performed the company's financial audit.
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant or 2) a financial report in a format comparable to RUS. Operating Report for Telecommunications Borrowers.	
(3023)	Underlying information subjected to a review by an independent certified public accountant.	
(3024) (3025)	Underlying Information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Ca	
(3026)	Attach the worksheet listing required information	442069tx3026.pdf
		Name of Attached Document Listing Required Information

Certifica Data Col	tion - Reporting Carrier lection Form	CC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
		Julý2013
<01.0>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

l certify that I am an officer of the reporting carrier; my responsibilities i recipients; and, to the best of my knowledge, the information reported o	nclude ensuring the accuracy of the annual reporting requirements for universal service suppor on this form and in any attachments is accurate.
Name of Reporting Carrier: ELECTRA TELEPHONE CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2014
Printed name of Authorized Officer: Deborah Nobles	
Title or position of Authorized Officer; Vice President of Regulato	ory Affairs
Telephone number of Authorized Officer: 9046880029 ext.	
Study Area Code of Reporting Carrier: 442069	Filing Due Date for this form: 07/01/2014

Attachments

Response to Line 112 Electra Telephone Company Study Area 442069

Initial Five-year Service Quality Improvement Plan – 47 C.F.R. §54.202(a)

Electra Telephone Company ("Electra") submits its initial five-year build-out Service Quality Improvement Plan pursuant to C.F.R. §54.202(a)(1)(ii) that specifies the proposed improvements or upgrades to Electra's network throughout its service area. In addition, Electra is providing information that includes an estimate of the population that will be served as a result of these improvements.

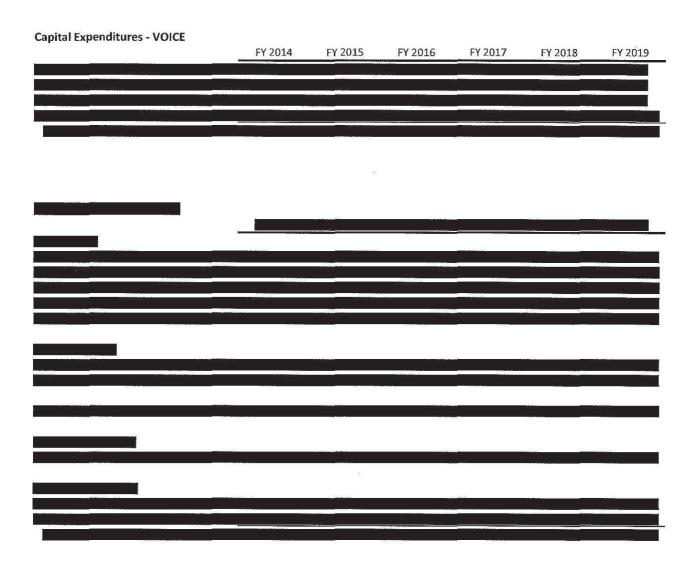
The receipt of USF support, combined with other funding sources will allow Electra to continue to meet its broadband obligations within its service area, complete service requests within a reasonable amount of time, and provide reliable, state-of-the-art, high-quality voice and broadband service, to its 974 rural customers in 1 wire center. The projects listed within this plan will be used to improve or upgrade the network over the next five years.

Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014

Electra Telephone Company

SAC: 442069

Wire Center CLLI: ELCTTXXADSO



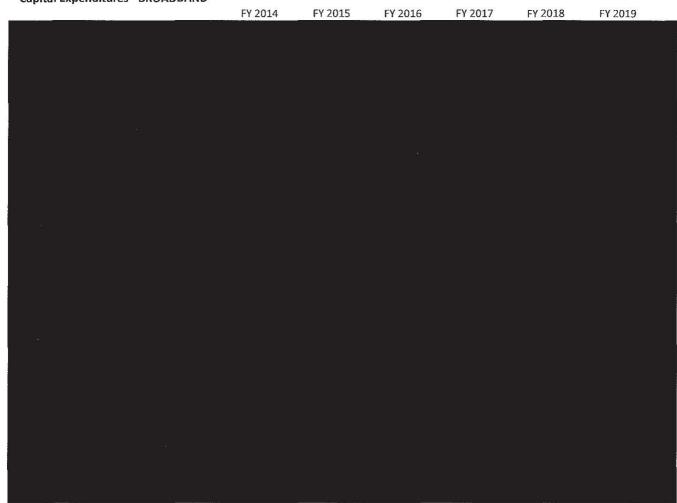
Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014

Electra Telephone Company

SAC:

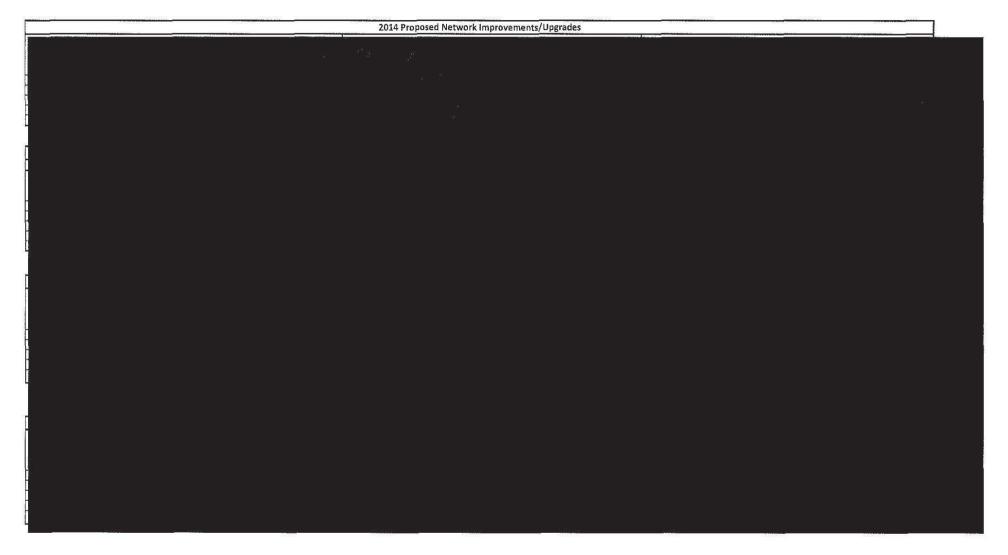
442069

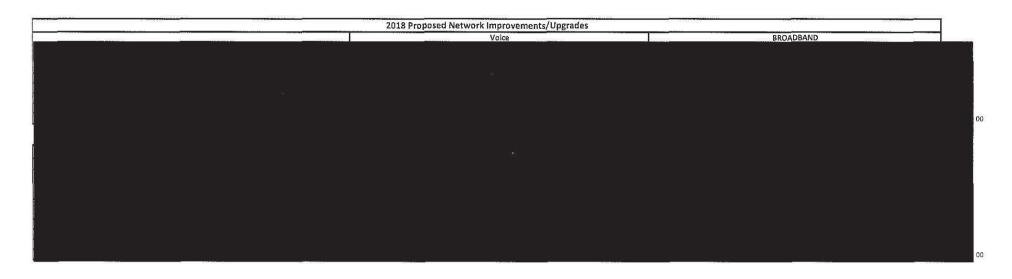
Capital Expenditures - BROADBAND



Data Request for FCC Annual Reporting Requirement § 54.313 (a) (1) - Five-Year Service Quality Improvement Plan July 1, 2014 Electra Telephone Company

SAC: 442069
Wire Center: ELCTTXXADSO





Carrier Name:

Electra Telephone Company

Carrier SPIN:

143002424

Carrier SAC:

442069

Operating State:

Texas

Line 510:

Service Quality Standards and Consumer Protection Rules Compliance

Electra Telephone Company ("Electra" or "the Company") complies with the following Texas rules in Administrative Code ("TAC"), Title 16, Part II, Chapter 26 – Substantive Rules Applicable to Telecommunications Service Providers:

Subchapter B. - Customer Service and Protection §26.21- §26.37

Subchapter C. – Infrastructure and Reliability §26.51- §26.57

Subchapter F. - Regulation of Telecommunications Service §26.121 - §26.134

Quarterly Service Quality Reports are submitted by the Company to the Texas Public Utility Commission ("TPUC") in accordance with Subchapter D §26.81. The reports show that Electra has achieved the service objectives and performance benchmarks established by the TPUC.

Electra complies with the following federal consumer protection rules and regulations:

FCC 47 C.F.R. §§64.2001-64.2011 – Customer Proprietary Network Information ("CPNI") FTC 16 C.F.R. §681.2 – Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003

All customer protection and disclosures established by the Fair Credit Reporting Act (15 U.S.C. §§1681, et seq.) and the Truth in Lending Act (15 U.S.C. §§1601, et seq.)

The Company has a CPNI Policy Manual detailing and enforcing the requirements of the federal CPNI rules. Each year, the CPNI Compliance Officer (1) communicates with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervises the training of Company employees and agents who use or have access to CPNI; (3) supervises the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintains records regarding the use of CPNI in marketing campaigns; and (5) receives, reviews and resolves questions or issues regarding use, disclosure, distribution or provision of access to CPNI. The CPNI Compliance Officer certifies compliance annually with the FCC by March 1.

The Company has an Identity Theft Prevention Program ("the Program") that was approved by the Board of Directors in September 2008. The Board appointed Red Flag Coordinator is responsible for updating the Program as necessary; the day-today supervision of the Program; training Company employees regarding their responsibilities with respect to the Program; and responding to employee questions and concerns regarding identity theft or the Program. The Red Flag Coordinator is required to annually prepare an Identity Theft Prevention Program Compliance Report for the Board's approval by October 1. The Identity Theft Prevention Program Compliance Report evaluates the effectiveness of the Program; the nature and extent of the Company's service provider arrangements and their impact on the effectiveness of the

Carrier Name:

Electra Telephone Company

Carrier SPIN:

143002424

Carrier SAC: Operating State:

442069 Texas

Line 610:

Functionality in Emergency Situations

Electra Telephone Company ("Electra" or "the Company") has an Emergency Operations Plan ("EOP" or "the Plan") in accordance with Substantive Rule §26.51(b) of the Texas Public Utility Commission's rules applicable to telecommunications providers, that addresses the requirements for continuity of service and systematic restoration of service after loss of service due to an emergency. The EOP is administered and maintained by a member of senior management of the parent company, Townes Telecommunications, Inc., and is reviewed annually to ensure that each applicable section is accurate and any changes or updates to the Plan are made on a timely basis.

An Emergency Director has been authorized to implement the provisions of the EOP. The Emergency Director conducts training with employees and is responsible for ensuring that all new employees are provided a 30 minute overview of the Plan as part of their orientation. Specific supervisory personnel receive additional intense instructions regarding special areas of the Plan. Annual Tabletop Drills are conducted, in which company personnel are required to run through an emergency scenario, activating the emergency response and service restoration plan.

The Plan established an Emergency Committee made up of senior management and key company personnel, who upon notification by the Emergency Director that a potential emergency exists, convene to declare an emergency, notify affected parties and assume control of restoration of service efforts.

An emergency control center is established at the Company's business office, which is equipped with a back-up power generator and a wireless telephone set. Depending upon the severity and type of emergency and the safety of the emergency location, a control center may be established at the site of the event.

In case of power outages, batteries in the central office will last on average from 4-8 hours depending on how many lines (AMP load) are served at that particular location. The stand-by generator has 24 hour diesel capacity and small generators are available to be put on smaller concentrators if power is lost. The small generators have to be refueled every few hours.

Program; reports any significant incidents involving identity theft and the Company's response to such incidents; and provides recommendations to the Board for periodic reviews of the Program and the adoption of material changes and other revisions, modifications and updates to the Program.

<703>

	e Offerings including Voice Rate Data ection Form	FCC Form 481. OMB Control No. 3060-0986/OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Deborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046890029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net
<701>	Residential Local Service Charge Effective Date 1/1/2014	
<702>	Single State-wide Residential Local Service Charge	

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fed
rx	ELECTRA		FR	11.15	0.0	0.54	3.5	15.19
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<010>	Study Area Code	442069
<015>	Study Area Name	ELECTRA TELEPHONE CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	peborah Nobles
<035>	Contact Telephone Number - Number of person identified in data line <030>	9046880029 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dnobles@townes.net

<711>

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	1000000	Broadband Service Upload Speed (Mbps)	Usage Allowance	<d4> Usage Allowance Action Taken When Limit Reached {select}</d4>
	ELECTRA	0.0	0.0	0.0	4.0	1.0	0.0	Other, No Usage Allowance
							91	
	12				- Maria Balan	- VILAN		
						110000		

<010>	Study Area Code		442069		
<015>	Study Area Name		ELECTRA TELE	PHONE CO	
<020>	Program Year	An operation of a design and a common of a	2015	on the state of th	50 TO TO TO THE T
<030>	Contact Name - Person L	JSAC should contact regarding this data	Deborah Noble	es	ones and an analysis of the second of the se
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	9046880029 es	xt.	
<039>	Contact Email Address - I	Email Address of person identified in data line <030>	dnobles@town	es.het	
<810>	Reporting Carrier	Electra Telephone Company			9
<811>	Holding Company	Townes Tele-Communications, Inc.	30		
<812>	Operating Company	N/A		127 0001	
<813>		₹ 31 5		<e2></e2>	ka3≻l
		Affiliates	i	SAC	Doing Business As Company or Brand Designation

Affiliates	SAC	Doing Business As Company or Brand Designation
ETCs:		
Choctaw Telephone Company	421893	N/A
Electra Telephone Company	442069	N/A
Haxtun Telephone Company	462190	N/A
MoKan Dial, Inc Kansas	411807	N/A
MoKan Dial, Inc Missouri	421807	N/A
Northeast Florida Telephone Company	210335	NEFCOM
Pymatunng Independent Telephone Company	170200	N/A
Tatum Telephone Company	442150	N/A
Walnut Hill Telephone Company	401729	N/A
Broadband Internet Access Providers:		
MoKan Communications, Inc.	20.4130 A 72	N/A
NEFCOM Long Distance, Inc.		NEFCOM Communications, Inc.
PT Communications		N/A
	nonno e un recurso de la compositione de la composi	

Response to Line 1010 Electra Telephone Company Study Area No. 442069

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Electra Telephone Company ("Electra") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$46.96 as specified in Public Notice DA 14-384 issued on March 20, 2014. Electra's current total monthly local end-user rate 1 of \$15.19, which is made up of a monthly basic local residential rate of \$11.15 plus a mandated monthly state USF fee of \$0.54 and mandatory monthly extended area service charges of \$3.50, is not above the standard deviation as specified in the USF/ICC Transformation Order. 2

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Carrier Name:

Electra Telephone Company

Carrier SPIN:

143002424

Carrier SAC: Operating State:

442069 Texas

Line 1210:

Terms and Conditions for Lifeline Program Customers

Electra Telephone Company ("Electra" or "the Company") complies with the FCC CFR 47 §§54.4, Universal Service Support for Low-Income Customers and the Texas Administrative Code, Title 16, Part 2, chapter 26, subchapter P, rule 26.412 — Lifeline Service program. The Company has developed a Lifeline Program Policy & Procedures Manual, which incorporates both the federal and state Low-Income Program requirements. Lifeline is a non-transferable retail service offering for which qualifying low-income consumers receive a \$9.25 federal discount and a \$3.50 state discount on flat rated basic local telephone service, whether it is purchased on a stand-alone basis or as part of a bundled service that includes voice and data services and optional calling features. Lifeline customers are charged a separate charge for toll calls, but are provided Toll Blocking free of charge if they elect to subscribe to the service. The Lifeline supported services are as shown below:

	Electra	
Residence Access Line	11.15	
ELCS	3.50	
Federal SLC	6.50	
Total Monthly Rate	21.15	
Lifeline Discounts to Total Monthly Rate: Federal Flat Rate Lifeline Support		FCC 497: Lifeline Worksheet
State Lifeline Support	(3.50)	Form RMT-1" TUSF Worksheet
Total Lifeline Service Monthly Rate	(12.75)	
	1	

Additional Services:

Toll Blocking is free to Lifeline customers who subscribe to this service.

The company is required to include the Lifeline Service Program in their Local Exchange Tariff. The rates for basic local residential service are also contained in the Local Exchange Tariff and the rates for the federal SLC are included in the NECA Tariff No. 5. Changes to any of these rates must be approved by the appropriate regulatory agency.

	· 3005b	IncomeStatement
Current Value For Total Fixed Charges (26)		Error Status
Prior Year	21	Value is valid.
This Year	10	Value is valid.

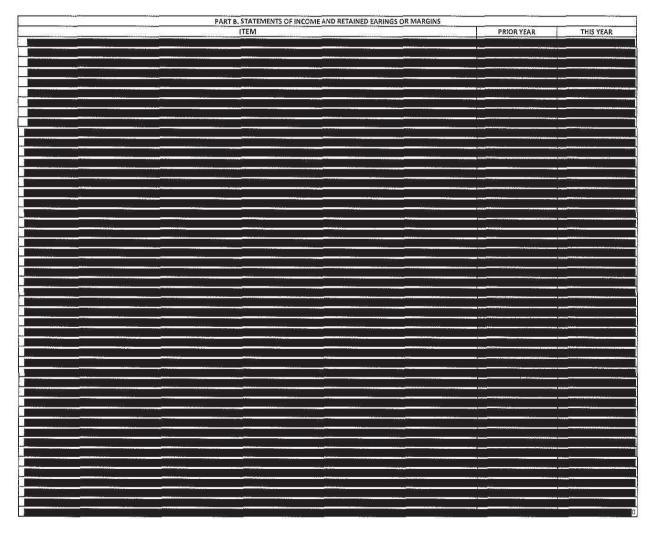
	Number of fields with invalid data		_
3005a BalanceSheet		0	
3005b IncomeStatement		0	
3005c Cashflow		0	

2000 Page 1	Mandatory fields that are blank		15 15 15 15 15 15 15 15 15 15 15 15 15 1
Worksheet	input item	Line Item	Error Status
3005a BalanceSheet	Study Area Code	<010>	OK .
3005a BalanceSheet Study Area Name		<01,5>	OK
3005a BalanceSheet Program Year		<020>	OK
3005a BalanceSheet	Contact Name - Person USAC should contact regarding this data	<030>	ок
3005a BalanceSheet	Contact Telephone Number - Number of person Identified in data line <030>	<035>	ок
3005a BalanceSheet	Contact Telephone Email Address - Email Address of person identified in data line <030>	<039>	OK
3005c Cashflow	Explanation for cell C20	5	OK
3005c Cashflow	Explanation for cell C39	22	OK
3005c Cashflow	Explanation for cell C45	27	OK .

		an not be zero		
Worksheet	Input Item	Line (tem	Error Status	
3005a BalanceSheet	Total Assets	24	OK	
3005a BalanceSheet	Total Liabilities and Equity	59	ok .	70
3005b IncomeStatement	Input Items for prior year		ок	
3005b IncomeStatement	Input items for current year		ок	

(3005a)	Operating Report for Privately-Held Rate of Return Carriers			FCC For	n 481		
	Sheet - Data Collection Form				ntrol No. 3060-0986		N 2000
Page 1 c				July 201	3		
					*		
	Study Area Code			<010>	<u>442</u> <u>Electra Telephone Company</u>	069	
	Study Area Name				Electra Telephone Company		
	Program Year Contact Name - Person USAC should contact regarding this data			<020>	Deborah Nobles	015	
	Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data	e line <nan< th=""><th></th><th></th><th>904-688-0029</th><th></th><th></th></nan<>			904-688-0029		
	Contact Telephone Email Address - Email Address of person iden		<030>	<0395	dnobles@townes.aet		
10337	Files as reviewed single company	ionica iii deta iiie	1000	10337		mmu	
		No.			Filed as audited single company		
-	Filed as reviewed consolidated company	Y 100 0			- Filed as audited consolidated company		
	Filed as subsidiary of reviewed consolidated con	mpany			Filed as subsidiary of audited consolidated company		7,01
		***************************************		CATION			5000 1915
We here	by certify that the entries in this report are in accordance with th	ne accounts and a	ther records of th	e system	and reflect the status of the system to the best of our know	ledge and belief.	1000000
	Deborah Nobles) 	<u> </u>			
	Signature		Date				<u> </u>
	1 orginatura		PART A. BAI	ANCE SE	I		
		BALANCE	BALANCE END	1		BALANCE	BALANCE END
	ASSETS	PRIOR YEAR	OF PERIOD		LIABILTIES AND STOCKHOLDERS' EQUITY	PRIOR YEAR	OF PERIOD
CURRE	NT ASSETS	Hiller de Hiller	and an include the	CURRE	NT LIABILITIES		
			100000000000000000000000000000000000000				
							decision of the second

(3005b) Operating Report for Privately-Held Rate of Return Carriers FCC Form 481 Balance Sheet - Data Collection Form OM8 Control No. 3060-0986 Page 2 of 3 July 2013 <010> Study Area Code <010> 442069 <015> Study Area Name <015> Electra Telephone Company <020> Program Year <020> 2015 <030> Contact Name - Person USAC should contact regarding this data <030> Deborah Nobles <035> Contact Telephone Number - Number of person Identified in data line <030> <035> 904-688-0029 <039> Contact Telephone Email Address - Email Address of person identified in data line <030> <039> dnobles@townes.net



(3005c) Operating Report for Privately-Held Rate of Return Carriers Balance Sheet - Data Collection Form

Page 3 of 3

<010> Study Area Code

<015> Study Area Name

<020> Program Year

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Telephone Email Address - Email Address of person identified in data line <030>

FCC Form 481

OMB Control No. 3060-0986

July 2013

<010>

442069

<015> Electra Telephone Company

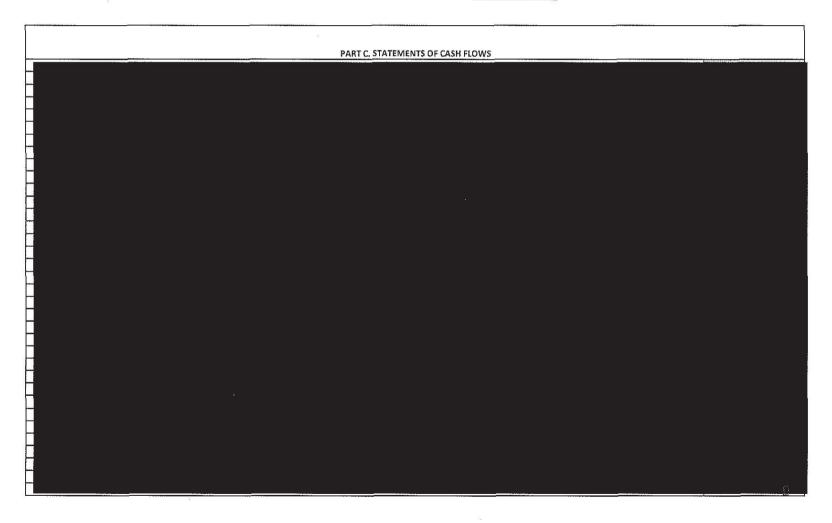
<020>

2015

<030> Deborah Nobles

<035> 904-688-0029

<039> dnobles@townes.net



Electra Telephone Company, Inc. 505 Plaza Circle Suite 200 Orange Park, Florida 32073

904-688-0017 (Fax) 904-688-0049

George Frederick CPA PLLC 7807 E Oberlin Way Scottsdale, AZ 85266

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NOS 01-92, 96-45, 96-4



Page 2 of 3



CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Page 3 of 3